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August 3, 2011

The Honorable Jocelyn Boyd  
Chief Clerk of the Commission  
Public Service Commission of South Carolina  
Post Office Drawer 11649  
Columbia, South Carolina 29211

Re: Petition of SBC Internet Services, Inc. d/b/a AT&T Internet Services  
Requesting the Commission's Intervention in Numbering Resources  
Determinations – Mill Creek Rate Center  
Docket No.

Dear Ms. Boyd:

SBC Internet Services, Inc. d/b/a AT&T Internet Services ("ATTIS") respectfully  
encloses for filing a Petition for Review of Numbering Resources Determination in the  
Mill Creek Rate Center in the above-captioned matter.

By copy of this letter, I am serving a copy of this document on all parties of  
record as indicated on the attached Certificate of Service.

Sincerely,

A handwritten signature in black ink that reads "Patrick W. Turner". The signature is written in a cursive, flowing style.

Patrick W. Turner

PWT/nml  
Attachment  
927387

BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA

In Re: PETITION OF SBC INTERNET SERVICES, INC.           )  
      D/B/A AT&T INTERNET SERVICES REQUESTING        )  
      THE COMMISSION'S INTERVENTION IN                )  
      NUMBERING RESOURCES DETERMINATIONS            )  
\_\_\_\_\_)

PETITION FOR REVIEW OF NUMBERING RESOURCES DETERMINATION  
IN THE MILL CREEK RATE CENTER

SBC Internet Services, Inc. d/b/a AT&T Internet Services ("ATTIS"), pursuant to rules adopted by the Federal Communications Commission ("FCC") for challenging numbering determinations, petitions the Public Service Commission of South Carolina ("Commission") for review of a recent denial of ATTIS' application for use of numbering resources in the 803 area code. Numbering determinations are made by the North American Numbering Plan Administrator ("NANPA") and/or the Pooling Administrator ("PA"), depending on the nature of the numbering request. The FCC's rules addressing these matters, however, generalize responsibilities of the NANPA and the PA under the heading "Central office code administration,"<sup>1</sup> and the FCC's Orders addressing these matters allow for challenges of determinations by both entities.<sup>2</sup> Accordingly, this Petition addresses the determination described herein and asks the Commission to direct NANPA and/or the PA to provide the requested relief to the extent it is within the respective authority and responsibility of NANPA and/or the PA to do so. The denial that is the subject of this Petition impacts ATTIS' ability to establish a new switch for its CVOIP/UNIVERSE service which will roll out in November 2011.

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<sup>1</sup> See, e.g., 47 C.F.R. §52.15.

<sup>2</sup> See Third Report and Order and Second Order on Reconsideration in CC Docket No. 96-98 and CC Docket No. 99-200, *Numbering Resource Optimization; etc.*, 17 FCC Rcd 252, ¶61 (2001) ("*Third NRO Order*").

In support of this Petition, ATTIS states:

1. ATTIS provides various unregulated services in various portions of South Carolina, including the Mill Creek exchange. In 2005, the FCC issued an order granting ATTIS a waiver to allow ATTIS to obtain direct access to numbering resources from NANPA and/or the PA.<sup>3</sup> As a condition of that Order, the FCC required ATTIS to provide the FCC and the relevant state commission(s) with notice before obtaining numbering resources from NANPA or the PA.<sup>4</sup> ATTIS provided both the FCC and this Commission notice of its intent to request the numbering resources that are the subject of this Petition as required by this FCC Order.<sup>5</sup>

2. NANPA is an independent non-governmental entity that is responsible for administering and managing the North American Numbering Plan (“NANP”).<sup>6</sup>

3. The PA is an independent non-governmental entity that is responsible for administering thousands-block number pooling.<sup>7</sup>

4. On March 31, 2000, the FCC issued an Order relating to numbering resource optimization.<sup>8</sup> The goal of the *First NRO Order* was to implement uniform standards governing requests for telephone numbering resources in order to increase efficiency in the use of existing telephone numbers and to avoid further exhaustion of existing numbers.

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<sup>3</sup> *Administration of the North American Numbering Plan*, CC Docket No. 99-200, Order, FCC 05-20 at ¶1 (released Feb. 1, 2005) (“*Numbering Waiver Order*”).

<sup>4</sup> *Id.* at ¶9 (imposing 30-day notice requirement).

<sup>5</sup> See Attachment A to this Petition (April 18, 2011 letter to FCC, voluminous attachments containing confidential commercial information not included) and Attachment B to this Petition (April 21, 2011 letter to this Commission).

<sup>6</sup> See 47 C.F.R. § 52.13 (a), (b).

<sup>7</sup> See 47 C.F.R. §52.7(g). See also 47 C.F.R. §52.20 (“Thousands-block number pooling is the process by which the 10,000 numbers in a central office code (NXX) are separated into ten sequential blocks of 1,000 numbers each (thousands-blocks), and allocated separately within a rate center.”).

<sup>8</sup> See Report and Order and Further Notice of Proposed Rule Making, *Numbering Resources Optimization*, 15 FCC Rcd 7574 (2000) (“*First NRO Order*”).

5. Among other things, the FCC required that, to qualify for access to new numbering resources, applicants must establish that existing inventory within the applicant's rate center will be exhausted within six months of the application. The FCC reaffirmed this requirement in two subsequent orders.<sup>9</sup> Prior to this ruling, the Central Office Code Assignment Guidelines used to make code assignments required the applicant's existing number inventory within the applicant's serving switch to exhaust within six months of the code application or the carrier had to prove that it was unable to meet a specific customer's request with its current inventory of numbers in order for a code to be assigned.

6. In addition to the months-to-exhaust ("MTE") requirement described above, the FCC's rules also required carriers to meet a rate center utilization threshold of 60 percent in order to receive additional numbering resources in a given rate center.<sup>10</sup> The utilization threshold has increased by five percent per year, and it has now reached the maximum of 75 percent. Based on the FCC's orders, carriers must meet both the six months MTE requirement and the utilization threshold on a rate center basis in order to obtain numbering resources.<sup>11</sup>

7. On or about July 12, 2011, ATTIS submitted a Pooling Administration System request for the assignment of one thousands-block in the Mill Creek exchange in the 803 area code.<sup>12</sup> In order to meet its need for numbers, ATTIS requested the assignment of the 803-525-7XXX one thousands-block.<sup>13</sup> This request is for a second network switch that will serve Mill Creek and other rate centers in South Carolina and nationally. The projected growth in ATTIS

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<sup>9</sup> See Second Report and Order, Order on Reconsideration in CC Docket No. 96-98 and CC Docket No. 99-200, and Second Further Notice of Proposed Rulemaking in CC Docket No. 99-200, *Numbering Resource Optimization*, 16 FCC Rcd 306 at ¶29 (2000) ("*Second NRO Order*"); *Third NRO Order* at ¶¶48-49.

<sup>10</sup> See *Second NRO Order* at ¶22; *Third NRO Order* at ¶¶50-52.

<sup>11</sup> *Third NRO Order* at ¶¶50-52.

<sup>12</sup> See Attachment C to this Petition.

<sup>13</sup> See *Id.*.

customers in this rate center makes prudent the acquisition of a number block in Mill Creek. This will be a footprint block for this additional network switch.

8. ATTIS' application was completed in accordance with Industry Numbering Committee ("INC") guidelines, and ATTIS filled out the necessary Month-to-Exhaust Certification Worksheets as required.

9. At the time of the filing of the numbering resource request, the Mill Creek Rate Center had a MTE of 5.970 months, and a utilization of 0%.<sup>14</sup> The exhaust date of this first network switch is projected to be shortly after the deployment of this second network switch.

10. Thereafter, on July 12, 2011, ATTIS' request was denied because ATTIS had not met the rate center based MTE and/or utilization criterion now set forth in the INC Guidelines.<sup>15</sup> ATTIS' numbering resource requests were denied despite the fact that ATTIS requires a footprint block for this second network switch in the Mill Creek Rate Center.

11. ATTIS' inability to obtain the requested numbering resources prevents ATTIS from providing the forecasted service its customers desire, need, and expect. If ATTIS is not assigned the numbering resources requested, ATTIS will be unable to accommodate growth and provide services requested by its customers. The refusal to grant numbering resources sufficient to meet the needs of its customers is inconsistent with the FCC's position that "(u)nder no circumstances should consumers be precluded from receiving telecommunications services of their choice from providers of their choice for want of numbering resources."<sup>16</sup>

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<sup>14</sup> *See Id.*

<sup>15</sup> *See Id.*

<sup>16</sup> *Second NRO Order* at ¶ 61.

12. Both the FCC's rules and the INC Guidelines provide that state regulatory authorities have the power and authority to review a decision to deny a request for numbering resources.<sup>17</sup>

13. Prior to the FCC's Order and the resulting change in the INC Guidelines, the applicable MTE procedures permitted a carrier to receive a code assignment, even if the MTE requirement at the switch level was not met. These waivers or exceptions were granted where customer hardships could be demonstrated or where the service provider's inventory did not have a block of sequential numbers large enough to meet the customer's specific request. Under today's procedures, numbering determinations are based on the MTE for the entire rate center without any exceptions. The FCC understood the need for the type of relief requested in this petition in a multiple-switch rate center based on input from SBC in the Second NRO Order,<sup>18</sup> and granting this request to accommodate future customer demand is consistent with that Order.

14. ATTIS requests that the Commission reverse the decision to withhold numbering resources from ATTIS because that decision interferes with ATTIS' ability to accommodate growth and provide services to its customers as required under South Carolina law.

15. This Commission (see Docket No. 2002 -185-C, Order No. 2002-415) and other state regulatory agencies in Alabama, Florida, Georgia, Louisiana, North Carolina, and Tennessee similarly have recognized their jurisdiction and authority to review numbering denials and to order the release of number resources to meet customer needs.

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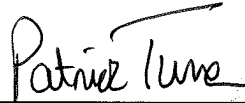
<sup>17</sup> See *Third NRO Order*, Appendix A, Final Rules, § 52.15(g) (4) ("The carrier may challenge the NANPA's decision to the appropriate state regulatory commission"); *Third NRO Order* at ¶¶ 61-66; *Central Office Code (NXX) Assignment Guidelines*, INC 95-407-009, § 13.0 (rev. April 26, 1999)(CO Code Guidelines) ("Appeals may include but are not limited to one or more of the following options: . . . C. The CO Code Administrator(s) and code holders/applicants may pursue the disagreement with the appropriate governmental/regulatory body").

<sup>18</sup> See *Second NRO Order* at ¶33.

**WHEREFORE**, ATTIS requests that the Commission:

- A. Reverse the decision to deny ATTIS' request for additional numbering resources;
- B. Direct NANPA and/or the PA (to the extent it is within the respective authority and responsibility of NANPA and/or the PA to do so) to provide ATTIS a one thousands-block in the Mill Creek exchange in the 803 area code, preferably the 803-525-7XXX one thousands-block in the Mill Creek exchange if available.
- C. Grant the requested relief as soon as possible.

Respectfully submitted this 3rd day of August 2011.



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Patrick W. Turner  
Suite 5200  
1600 Williams Street  
Columbia, South Carolina 29201  
(803) 401-2900

ATTORNEY FOR ATTIS

926876

# ATTACHMENT A



CONTAINS CONFIDENTIAL COMMERCIAL INFORMATION



*William A. Brown*  
General Attorney

AT&T Services, Inc.  
1120 20<sup>th</sup> Street, N.W.  
Suite 1000  
Washington, D.C. 20036

202.457.3007 Phone  
202.457.3073 Fax

April 18, 2011

Ms. Ann Stevens  
Competition Policy Division  
Wireline Competition Bureau  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

Re: AT&T Internet Services Request for Numbering Resources  
Pursuant to *Administration of the North American Numbering Plan*, CC Docket  
No. 99-200, Order, FCC 05-20 (released Feb. 1, 2005).

Dear Ms. Stevens:

Pursuant to the Commission's *Numbering Waiver Order*<sup>1</sup> and the Wireline Competition Bureau's request, SBC Internet Services, Inc. d/b/a AT&T Internet Services (ATTIS) hereby notifies the Commission of its intent to request numbering resources for the rate centers listed in the attached advanced copies of the "Part 1 and/or Part 1A" numbering resource application. In addition to filing the attached information with the Commission today, we are also submitting the relevant portions of this information to the appropriate state commissions.

Please do not hesitate to contact me if you have any questions or need additional information.

Sincerely,

/s/

Lacretia Hill for William A. Brown  
On Behalf of AT&T Internet Services

Attachments

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<sup>1</sup> *Administration of the North American Numbering Plan*, CC Docket No. 99-200, Order, FCC 05-20 (released Feb. 1, 2005) (*Numbering Waiver Order*).

CONTAINS CONFIDENTIAL COMMERCIAL INFORMATION

Attachments Containing Confidential Commercial Information Not Included

# **ATTACHMENT B**



Cindy Cox

AT&T South Carolina  
1600 Williams Street  
Suite 5470  
Columbia, SC 29201

T: 803.401.2252  
F: 803.771.4600  
cc2203@att.com  
www.att.com

NDI 2011-15-C

April 21, 2011

RECEIVED

APR 21 2011

PSC SC  
CLERK'S OFFICE

Ms. Jocelyn Boyd  
Chief Clerk/Administrator  
Public Service Commission of South Carolina  
101 Executive Center Dr., Suite 100  
Columbia, SC 29211

Re: SBC Internet Services, Inc. dba AT&T Internet Services request Numbering Resources  
Pursuant to *Administration of the North American Numbering Plan*, FCC Docket No. 99-200, Order, FCC 05-20 (released Feb. 1, 2005)

Dear Ms. Boyd:

Pursuant to the Federal Communications Commission's Docket No. 99-200, SBC Internet Services, Inc. dba AT&T Internet Services (ATTIS) hereby notifies this Commission of its intent to request numbering resources for the rate centers listed in the attached Part 1 and/or Part 1A. Under that order, we are required to provide this Commission with this notice before obtaining numbering resources from the North American Numbering Plan Administrator and/or the Pooling Administrator.<sup>1</sup> In addition to filing the attached information with this Commission, we are also submitting this information to the Federal Communications Commission.

This is for your notification only. No action is required by the Commission.

Yours very truly,

Executive Director

Enclosure

CC: Dawn Hipp, ORS

RECEIVED  
2011 APR 21 PM 1:12  
PUBLIC SERVICE  
COMMISSION

<sup>1</sup> *Id.* ¶ 9 (imposing 30-day notice requirement).

**Central Office Code Assignment Guidelines (COCAG)**  
**Central Office Code (NXX) Assignment Request – Part 1 (ATIS-0300050.p1)**  
**July 19, 2010**

Tracking Number: \_\_\_\_\_

Type of Application:    ☒ New                      ☐ Change<sup>1</sup>                      ☐ Delete

**1.0 GENERAL INFORMATION**

**1.1 Contact Information:**

Code Applicant:

Company/Entity Name: SBC INTERNET SERVICES, INC. d/b/a AT&T INTERNET SERVICES  
Headquarters Address: 202 S. AKARD STREET  
City, State, Zip: DALLAS, TEXAS 75202  
Contact Name: PATTY BERRIS  
Contact Address: 2600 CAMINO RAMON, ROOM 2S750MM  
City, State, Zip: SAN RAMON, CA 94583  
Phone: 925-901-1934    Fax: 925-355-9268    E-Mail: pb1986@att.com

Code Administrator<sup>2</sup>:

Name: \_\_\_\_\_  
Address: \_\_\_\_\_  
City, State, Zip: \_\_\_\_\_  
Phone: \_\_\_\_\_    Fax: \_\_\_\_\_

1.2    NPA: 803    NXX<sup>3</sup>: \_\_\_\_\_    LATA: 422    OCN<sup>4</sup>: 516C    Parent Company's OCN(s): 0555  
Switching Identification(Switching Entity/POI)<sup>5</sup>: CHRLNCCA82Z  
Locality/City/Wire Center: \_\_\_\_\_    Rate Center<sup>6</sup>: MILL CREEK  
Homing Tandem Operating Co.<sup>7</sup>: AT&T    Tandem Homing CLLI<sup>TM 8</sup>: CHRLNCBO05T

1.3    Dates:    Date of Application: \_\_\_\_\_    Requested Effective Date<sup>9 10</sup>: \_\_\_\_\_

☒ By selecting this checkbox, I acknowledge that I am requesting the earliest possible effective date the Administrator can grant. Please note that this only applies to a reduction in the Administrator's processing time, however the request will still be processed in the order received.

Request Expedited Treatment    ☐ Yes    ☐ No    Expedite Documentation must be provided if  
"Request Expedite" = Yes

Expedite Explanation    \_\_\_\_\_

- 1.4    a). Type of company/entity requesting the code: VOIP (LEC, IC, CMRS, Other)  
b). Type of Service VOIP (e.g., Cellular – Type 2)  
c). Code Assignment Preference (Optional) \_\_\_\_\_  
d). Codes that are undesirable, if any \_\_\_\_\_  
e). Type of Change (Mark all that apply):  
    ☐ OCN: Intra-company<sup>11</sup>    ☐ Switching Id    ☐ Rate Center    ☐ Tandem Homing CLLI  
    ☐ OCN: Inter-company<sup>12</sup>    ☐ Effective Date    ☐ LATA    ☐ Extend Reservation

**Central Office Code Assignment Guidelines (COCAG)**  
**Central Office Code (NXX) Assignment Request – Part 1 (ATIS-0300050.p1)**  
**July 19, 2010**

1.5 Type of Request (Initial, Growth, etc.) INITIAL

If an initial code, attach (1) evidence of certification and (2) proof of ability to place code in service within 60 days. If a growth code, attach months to exhaust worksheet.

Pool Indicator<sup>13</sup>: ☒ Yes ☐ No

1.6 NPA Jeopardy Criteria Apply: ☐ Yes ☒ No

1.7 Code request for new service (Explain): INITIAL LRN REQUEST

1.8 ☐

It is the code applicant's responsibility to arrange input of Part 2 information into BIRRDs. The 45-calendar day nationwide minimum interval cut-over for BIRRDs will not begin until input into BIRRDs has been completed.

Comments: Retain the "7" block out of the code and donate remaining "9" blocks to the NeuStar Number Pool.

I hereby certify that the above information requesting an NXX code is true and accurate to the best of my knowledge and that this application has been prepared in accordance with the Central Office Code (NXX) Assignment Guidelines posted to the ATIS web site (<http://www.atis.org/inc/docs.asp>) as of the date of this application.<sup>14</sup>

PATTY BERRIS  
Signature of Code Applicant

DATA ADMINISTRATOR  
Title

APRIL 18, 2011  
Date

**Central Office Code Assignment Guidelines (COCAG)**  
**Central Office Code (NXX) Assignment Request – Part 1 (ATIS-0300050.p1)**  
**July 19, 2010**

<sup>1</sup> Identify type and reason for change(s) in Section 1.4(e).

<sup>2</sup> A list of the current Code Administrator(s) who can provide assistance in completing this form is available upon request from NANPA.

<sup>3</sup> The NXX field is required for any code request in which there is a change or the NXX is being returned.

<sup>4</sup> Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to CO Code assignments, NECA-assigned Company Codes may be used as OCNs. Companies with no prior CO Code or Company Code assignments may contact NECA (800-228-8597) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignment should direct questions regarding appropriate OCN usage to the Telcordia™ Routing Administration (TRA) on 732-699-6700.

<sup>5</sup> This is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the eleven-character Telcordia™ COMMON LANGUAGE CLLI™ Location Identification of the applicant's switch or POI. (Telcordia and CLLI are trademarks and COMMON LANGUAGE is a registered trademarks of Telcordia Technologies, Inc.)

<sup>6</sup> Rate Center name must be a tariffed Rate Center associated with toll billing.

<sup>7</sup> Applies to any code applicant connecting to the Public Switched Telephone Network via a tandem owned by a different carrier.

<sup>8</sup> Telcordia and CLLI are trademarks and COMMON LANGUAGE is a registered trademarks of Telcordia Technologies, Inc.

<sup>9</sup> This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI™ Location Identification Code of the switching entity/POI, and is the same on Part 2, Form 1, Page 2 of 2.

<sup>10</sup> Code applicants should request an effective date that is at least 66 calendar days from the submission of this form. It should be noted that interconnection arrangements and facilities need to be in place prior to activation of a code. Such arrangements are outside the scope of these guidelines.

<sup>11</sup> Requests for code assignment should not be made more than six months prior to the requested effective date.

<sup>12</sup> Select if you are the current Code Holder

<sup>13</sup> Select if you are not the current Code Holder

<sup>14</sup> The Applicant will indicate "Yes" if the NXX being requested will be used for thousands-block number pooling and will leave this field blank if it is not.

<sup>15</sup> An incomplete form may result in delays in processing this request.

Tracking Number: \_\_\_\_\_  
TBPAG Attachment 1  
ATIS-0300066.at1

November 17, 2008

**Thousands-Block Application Form**  
**Part 1A**

Type of Application (check one):   x   New        Change<sup>I</sup>        Disconnect

GENERAL APPLICATION INFORMATION

**1.1 Contact Information:**

Block Applicant:

Company Name: SBC INTERNET SERVICES, INC. d/b/a AT&T INTERNET SERVICES  
Headquarters Address: 208 S. AKARD ST. City DALLAS State TX Zip 75202  
Contact Name: PATTY BERRIS  
Contact Address 2600 CAMINO RAMON City SAN RAMON State CA Zip 94583  
Phone: 925-901-1934 Fax: 925-355-9268  
E-Mail: pb1986@att.com

Pooling Administrator<sup>II</sup>:

Contact Name: \_\_\_\_\_  
Contact Address: \_\_\_\_\_  
City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_  
Phone: \_\_\_\_\_ Fax: \_\_\_\_\_  
E-Mail: \_\_\_\_\_

**1.2 General Information**

Check one: No LRN needed        LRN needed<sup>III</sup>   X  

NPA: 803 LATA 422 OCN<sup>IV</sup>: 516C Parent Company's OCN 0555  
Number of Thousands-Blocks Requested: 1

Switch Identification (Switching Entity/POI)<sup>V</sup>: CHRLNCCA82Z City or Wire Center Name \_\_\_\_\_  
Rate Center<sup>VI</sup>: MILL CREEK Rate Center Sub Zone: \_\_\_\_\_

**1.3 Dates**

Date of Application<sup>VII</sup>: \_\_\_\_\_ Requested Block Effective Date<sup>VIII</sup>: \_\_\_\_\_  
Request Expedited Treatment? (See Section 8.6) Yes        No       

☒ By selecting this checkbox, I acknowledge that I am requesting the earliest possible effective date the Administrator can grant. Please note that this only applies to a reduction in the Administrator's processing time, however the request will still be processed in the order received.

**1.4 Type of Service Provider Requesting the Thousands-Block:**

- a) Type of Service Provider: VOIP (LEC, IXC, CMRS, Other)
- b) Primary type of service Blocks to be used for: VOIP
- c) Thousands-Block(s) (NXX-X) assignment preference (optional) \_\_\_\_\_
- d) Thousands-Block(s) (NXX-X) that are undesirable for this assignment, if any \_\_\_\_\_
- e) If requesting a code for LRN purposes, indicate which block(s) you will be keeping (the remainder of the blocks will be given to the pool)   7



Tracking Number: \_\_\_\_\_  
TBPAG Attachment 1  
ATIS-0300066.at1

November 17, 2008

**Thousands-Block Application Form  
Part 1A**

**1.5 Type of Request**

Initial block for rate center: Yes ☒ If Yes attach evidence of authorization and proof of capability to provide Service within 60 days

Growth block for rate center: Yes ☐ If Yes, attach months to exhaust worksheet

☐ By selecting this checkbox, I acknowledge that I am willing to accept a block in red and explicitly understand that the underlying CO code may not yet be activated in the PSTN and loaded in the NPAC on the block effective date.

Type of Change (Mark all that apply):

☐ OCN: Intra-company<sup>x</sup>    ☐ Switching Id    ☐ Part 1B  
☐ OCN: Inter-company<sup>x</sup>    ☐ Effective Date

Change block: Yes \_\_\_\_\_, If Yes, list NPA-NXX-X \_\_\_\_\_

**1.6 Block Return**

- a) Is this block Contaminated: Yes \_\_\_\_\_ or No \_\_\_\_\_  
b) If Yes how many TNs are NOT available for assignment: \_\_\_\_\_  
c) Have all new Intra SP ports been completed in the NPAC: Yes \_\_\_\_\_ or No \_\_\_\_\_  
d) Has this block been protected from further assignment: Yes \_\_\_\_\_ or No \_\_\_\_\_

Disconnect block: Yes \_\_\_\_\_, If Yes, list NPA-NXX-X \_\_\_\_\_

Remarks: BLOCK for LRN.

I hereby certify that the above information requesting an NXX-X block is true and accurate to the best of my knowledge and that this application has been prepared in accordance with the Thousands-Block (NXX-X) Pooling Administration Guidelines ATIS-0300066 available on the ATIS web site ([www.atis.org/inc](http://www.atis.org/inc)) or by contacting [inc@atis.org](mailto:inc@atis.org) as of the date of this application.

PATTY BERRIS  
Signature of Block Applicant

DATA ADMINISTRATOR  
Title

APRIL 18, 2011  
Date

Tracking Number: \_\_\_\_\_  
TBPAG Attachment 1  
ATIS-0300066.at1

November 17, 2008

### Thousands-Block Application Form Part 1A

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**Instructions for filling out each Section of the Part 1A form:**

Section 1.1 Contact information requires that Service Providers supply under "Block Applicant" the company name, company headquarters address, a contact within the company, an address where the contact person may be reached, in addition to the correct phone, fax, and e-mail address. The Pooling Administrator section also requires the Service Provider to fill in the Pooling Administrator's name, address, phone, fax and e-mail.

Section 1.2 Service Providers who need a thousands-block assignment or for an Location Routing Number (LRN) are required to fill in this section. If needed for an LRN, a CO Code Application needs to also be submitted to the PA. The Service Provider should supply the Numbering Plan Area (NPA); the Local Access Transport Area (LATA), which is a three-digit number that can be found in the Telcordia™ LERG™ Routing Guide. The Operating Company Number (OCN) assigned to the service provider and the OCN its parent company. An OCN is a four-character alphanumeric assigned by Telcordia™ Routing Administration (TRA). In addition, the number of thousands-blocks requested should be supplied. The Switch Identification as well as the city or wire center name, rate center, rate center sub zone, homing tandem and CLLI™ tandem of the facilities based provider<sup>d</sup>. Explanations of these terms may be found in the footnotes.

Section 1.3 The date the Service Provider completes the application should be entered in this section, as well as the Effective Date of the requested thousands-block.

Section 1.4 Service Providers should indicate their type, e.g., local exchange carrier, competitive local exchange carrier, interexchange carrier, CMRS. They also indicate the primary type of business in which the numbering resource is to be used. Service Providers also may indicate their preference for a particular thousands-block, e.g., 321-9XXX, or indicate any thousands-blocks that may be undesirable, e.g., 321-6XXX.

Section 1.5 Service Providers indicate the type of request. Initial requests are for first applications for thousands-blocks in a rate center, growth for additional thousands-blocks in a rate center in which the applicant already has numbering resources, and provide the required evidence as ordered by the FCC.

Section 1.6 Service Providers must indicate the updated/current information in regards to contaminated TNs on the block they are returning to the pool. Blocks with over 10% contamination (101 TNs or more) shall not be returned to the pool unless they meet criteria outlined in section 9.1.2 of these Guidelines. If the block being returned is over 10% contaminated the PA shall seek a new block holder. If question c and/or d have a response of No, the request for return shall be denied.

The thousands-block applicant certifies veracity of this form by signing their name, and providing their title and date.

Tracking Number: \_\_\_\_\_  
TBPAG Attachment 1  
ATIS-0300066.at1

November 17, 2008

### Thousands-Block Application Form Part 1A

Footnotes:

- <sup>i</sup> Identify the type of change(s) in Section 1.5.
- <sup>ii</sup> The Pool Administrator is available to assist in completing these forms.
- <sup>iii</sup> A CO Code application will also need to be submitted to the PA
- <sup>iv</sup> Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to CO Code assignments, NECA-assigned Company Codes may be used as OCNs. Companies with no prior CO Code or Company Code assignments should contact NECA (800 524-1020) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignments should direct questions regarding appropriate OCN usage to (TRA) (732-699-6700).
- <sup>v</sup> This is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the 11 character CLLI<sup>TM</sup> code of the switch /POI.
- <sup>vi</sup> Rate Center name must be a tariffed Rate Center.
- <sup>vii</sup> Acknowledgment and indication of disposition of this application will be provided to applicant within seven calendar days from the date of receipt of this application. An incomplete form may result in delays in processing this request.
- <sup>viii</sup> Please ensure that the NPA-NXX of the LRN to be associated with this block(s) is/will be active in the PSTN prior to the effective date of the block(s).
- <sup>ix</sup> Select if you are the current Block Holder
- <sup>x</sup> Select if you are not the current Block Holder
- <sup>xi</sup> Telcordia, LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc.

# ATTACHMENT C



**Patty Berris**  
Data Administrator  
AT&T Network Operations

2600 Camino Ramon  
Room 2S750MM  
San Ramon, CA 94583  
925-901-1934  
[pb1986@att.com](mailto:pb1986@att.com)

June 13, 2011

Re: LRN request for MILL CREEK Rate Center OCN 516C

To Whom It May Concern:

This letter documents our requirements in relation to additional numbering resources for SBC Internet Services, Inc. d/b/a AT&T Internet Services (SBCIS/ATTIS). It is understood that SBCIS/ATTIS may take this request to the State Commission, if needed, to fulfill our request for one block in the Mill Creek rate center for a LRN use.

SBCIS/ATTIS is establishing a new switch (CHRLNCCA82Z) for our Module 3 project for CVoIP/UVERSE which will roll out in November 2011. We are requesting for one block and we would prefer NPA/NXX-7.

At this time, the Rate Center does not meet the required FCC criteria to obtain growth resources.

It is imperative that we have these additional numbers to prevent our organization from incurring damages as it relates to customer satisfaction. If more information is needed, please advise.

Thank you in advance,

Patty Berris  
Data Administrator – Code Administration

☐ Extend Reservation

**Central Office Code Assignment Guidelines (COCAG)**  
**Central Office Code (NXX) Assignment Request – Part 1 (ATIS-0300050.p1)**  
**July 19, 2010**

1.5 Type of Request (Initial, Growth, etc.) Growth

If an initial code, attach (1) evidence of certification and (2) proof of ability to place code in service within 60 days.  
If a growth code, attach months to exhaust worksheet.

Pool Indicator<sup>13</sup>: ☒ Yes ☐ No

1.6 NPA Jeopardy Criteria Apply: ☐ Yes ☐ No

1.7 Code request for new service (Explain): REQUIRE LRN TO SUPPORT NETWORK PLANS

1.8 ☐

It is the code applicant's responsibility to arrange input of Part 2 information into BIRRDs. The 45-calendar day nationwide minimum interval cut-over for BIRRDs will not begin until input into BIRRDs has been completed.

Comments: RETAIN ONLY THE '7' BLOCK OUT OF CODE AND DONATE REMAINING BLOCKS TO THE NUMBER POOL.

I hereby certify that the above information requesting an NXX code is true and accurate to the best of my knowledge and that this application has been prepared in accordance with the Central Office Code (NXX) Assignment Guidelines posted to the ATIS web site (<http://www.atis.org/inc/incguides.asp>) as of the date of this application.<sup>14</sup>

<u>PATTY BERRIS</u>	<u>DATA ADMINSTRATOR</u>	<u>06/13/2011</u>
Signature of Code Applicant	Title	Date

**Central Office Code Assignment Guidelines (COCAG)**  
**Central Office Code (NXX) Assignment Request – Part 1 (ATIS-0300050.p1)**  
**July 19, 2010**

---

<sup>1</sup> Identify type and reason for change(s) in Section 1.4(e).

<sup>2</sup> A list of the current Code Administrator(s) who can provide assistance in completing this form is available upon request from NANPA.

<sup>3</sup> The NXX field is required for any code request in which there is a change or the NXX is being returned.

<sup>4</sup> Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to CO Code assignments, NECA-assigned Company Codes may be used as OCNs. Companies with no prior CO Code or Company Code assignments may contact NECA(800-228-8597) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignment should direct questions regarding appropriate OCN usage to the Telcordia™ Routing Administration (TRA) on 732-699-6700.

<sup>5</sup> This is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the eleven-character Telcordia™ COMMON LANGUAGE CLLI™ Location Identification of the applicant's switch or POI. (Telcordia and CLLI are trademarks and COMMON LANGUAGE is a registered trademarks of Telcordia Technologies, Inc.)

<sup>6</sup> Rate Center name must be a tariffed Rate Center associated with toll billing.

<sup>7</sup> Applies to any code applicant connecting to the Public Switched Telephone Network via a tandem owned by a different carrier.

<sup>8</sup> This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI™ Location Identification Code of the switching entity/POI, and is the same on Part 2, Form 1, Page 2 of 2.

<sup>9</sup> Code applicants should request an effective date that is at least 66 calendar days from the submission of this form. It should be noted that interconnection arrangements and facilities need to be in place prior to activation of a code. Such arrangements are outside the scope of these guidelines.

<sup>10</sup> Requests for code assignment shall not be made more than six months prior to the requested effective date.

<sup>11</sup> Select if you are the current Code Holder

<sup>12</sup> Select if you are not the current Code Holder

<sup>13</sup> The Applicant will indicate "Yes" if the NXX being requested will be used for thousands-block number pooling and will leave this field blank if it is not.

<sup>14</sup> An incomplete form may result in delays in processing this request.



Tracking Number: \_\_\_\_\_

TBPAG Attachment 1 – March 19, 2007  
ATIS-0300066.at1

## Thousands-Block Application Form Part 1A

Type of Application (check one): ☒ New ☐ Change<sup>1</sup> ☐ Disconnect

### GENERAL APPLICATION INFORMATION

#### 1.1 Contact Information:

##### Block Applicant:

Company Name: SBCIS/ATTIS

Headquarters Address: 2600 CAMINO RAMON City SAN RAMON State CA Zip 94583

Contact Name: Patty Berris

Contact Address: 2600 CAMINO RAMON City SAN RAMON State CA Zip 94583

Phone: 925-901-1934 Fax: 925-355-9268

E-Mail: pb1986@att.com

##### Pooling Administrator<sup>II</sup>:

Contact Name: JOHN AUERBACH

Contact Address: 1800 SUTTER ST SUITE 780, CONCORD, CA 94520

Phone: 925-363-8742 Fax: 925-363-7692

E-Mail: john.auerbach@neustar.biz

#### 1.2 General Information

Check one: No LRN needed \_\_\_\_\_ LRN needed<sup>III</sup> x \_\_\_\_\_

NPA: 803 LATA: 422 OCN<sup>IV</sup>: 516C Parent Company's OCN 0555

Number of Thousands-Blocks Requested: 1

Switch Identification (Switching Entity/POI)<sup>V</sup>: CHRLNCCA82Z City or Wire Center Name

Rate Center<sup>VI</sup>: MILL CREEK Rate Center Sub Zone: \_\_\_\_\_

#### 1.3 Dates

Date of Application<sup>VII</sup>: 06/13/2011 Requested Block Effective Date<sup>VIII</sup>: ASAP

Request Expedited Treatment? (See Section 8.6) Yes X No \_\_\_\_\_

#### 1.4 Type of Service Provider Requesting the Thousands-Block:

a) Type of Service Provider: VoIP (LEC, IXC, CMRS, Other)

b) Primary type of service Blocks to be used for: Other

c) Thousands-Block(s) (NXX-X) assignment preference (optional) \_\_\_\_\_

d) Thousands-Block(s) (NXX-X) that are undesirable for this assignment, if any \_\_\_\_\_

e) If requesting a code for LRN purposes, indicate which block(s) you will be keeping (the remainder of the blocks will be given to the pool) 7

Tracking Number: \_\_\_\_\_

TBPAG Attachment 1 – March 19, 2007  
ATIS-0300066.at1

**Thousands-Block Application Form**  
**Part 1A**

**1.5 Type of Request**

Initial block for rate center: No X, If Yes attach evidence of authorization and proof of capability to provide Service within 60 days

Growth block for rate center: Yes X, If Yes, attach months to exhaust worksheet

Change block: No \_\_\_\_\_, If Yes, indicate NPA-NXX-X, type of and reason for change:  
\_\_\_\_\_

Disconnect block: No \_\_\_\_\_, If Yes, list NPA-NXX-X \_\_\_\_\_

Remarks: \_\_\_\_\_

I hereby certify that the above information requesting an NXX-X block is true and accurate to the best of my knowledge and that this application has been prepared in accordance with the Thousands-Block (NXX-X) Pooling Administration Guidelines ATIS-0300066.

Patty Berris (SIGNATURE ON FILE)

Code Administrator

06/13/2011

Signature of Block Applicant

Title

Date

Tracking Number: \_\_\_\_\_

TBPAG Attachment 1 – March 19, 2007  
ATIS-0300066.at1

## Thousands-Block Application Form Part 1A

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**Instructions for filling out each Section of the Part 1A form:**

**Section 1.1** Contact information requires that Service Providers supply under “Block Applicant” the company name, company headquarters address, a contact within the company, an address where the contact person may be reached, in addition to the correct phone, fax, and e-mail address. The Pooling Administrator section also requires the Service Provider to fill in the Pooling Administrator’s name, address, phone, fax and e-mail.

**Section 1.2** Service Providers who need a thousands-block assignment or for an Location Routing Number (LRN) are required to fill in this section. If needed for an LRN, a CO Code Application needs to also be submitted to the PA. The Service Provider should supply the Numbering Plan Area (NPA); the Local Access Transport Area (LATA), which is a three-digit number that can be found in the Telcordia™ LERG™ Routing Guide. The Operating Company Number (OCN) assigned to the service provider and the OCN its parent company. An OCN is a four-character alphanumeric assigned by Telcordia™ Routing Administration (TRA). In addition, the number of thousands-blocks requested should be supplied. The Switch Identification as well as the city or wire center name, rate center, rate center sub zone, homing tandem and CLLI™ tandem of the facilities based provider<sup>ix</sup>. Explanations of these terms may be found in the footnotes.

**Section 1.3** The date the Service Provider completes the application should be entered in this section, as well as the Effective Date of the requested thousands-block.

**Section 1.4** Service Providers should indicate their type, e.g., local exchange carrier, competitive local exchange carrier, interexchange carrier, CMRS. They also indicate the primary type of business in which the numbering resource is to be used. Service Providers also may indicate their preference for a particular thousands-block, e.g., 321-9XXX, or indicate any thousands-blocks that may be undesirable, e.g., 321-6XXX.

**Section 1.5** Service Providers indicate the type of request. Initial requests are for first applications for thousands-blocks in a rate center, growth for additional thousands-blocks in a rate center in which the applicant already has numbering resources, and provide the required evidence as ordered by the FCC.

The thousands-block applicant certifies veracity of this form by signing their name, and providing their title and date.

Tracking Number: \_\_\_\_\_

TBPAG Attachment 1 – March 19, 2007  
ATIS-0300066.at1

## Thousands-Block Application Form Part 1A

Foot Notes:

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<sup>i</sup> Identify type of and reason for change(s) in Section 1.5.

<sup>ii</sup> The Pool Administrator is available to assist in completing these forms.

<sup>iii</sup> A CO Code application will also need to be submitted to the PA

<sup>iv</sup> Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to CO Code assignments, NECA-assigned Company Codes may be used as OCNs. Companies with no prior CO Code or Company Code assignments should contact NECA (800 524-1020) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignments should direct questions regarding appropriate OCN usage to (TRA) (732-699-6700).

<sup>v</sup> This is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the 11 character CLLI™ code of the switch /POI.

<sup>vi</sup> Rate Center name must be a tariffed Rate Center.

<sup>vii</sup> Acknowledgment and indication of disposition of this application will be provided to applicant within seven calendar days from the date of receipt of this application. An incomplete form may result in delays in processing this request.

<sup>viii</sup> Please ensure that the NPA-NXX of the LRN to be associated with this block(s) is/will be active in the PSTN prior to the effective date of the block(s).

<sup>ix</sup> Telcordia, LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc.

# Appendix 3 - Modified August 6, 2001

## MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORKSHEET – TN Level<sup>1</sup> (Thousands-Block Number Pooling Growth Block Request)

Date: 06/13/11 OCN: 516C Company Name: SBCIS/ATTIS  
 Rate Center: MILL CREEK  
 List all Codes NPA(s)-NXXs and Blocks NPA(s)-NXX-X(s): NXX (0), NXX-X(1)  
 Name of Block Applicant: Patty Berris Signature: ON FILE  
 Title: DATA ADMINISTRATOR Telephone No.: 925-901-1934 FAX No.: 925-355-9268  
 E-Mail: pb1986@att.com

A. Available Numbers: 995

B. Assigned Numbers: 0

C. Total Numbering Resources: 1000

D. Quantity of numbers activated in the past 90 days and excluded from the Utilization calculation: 0  
 List excluded Code(s) or Block(s): \_\_\_\_\_

	Month #1	Month #2	Month #3	Month #4	Month #5	Month #6	Month #7	Month #8	Month #9	Month #10	Month #11	Month #12
E. Growth History – Previous months <sup>2</sup>	0	0	0	0	0	0	0	0	0	0	0	0
F. Forecast – Next 12 months <sup>3</sup>	0	1000	0	0	0	0	0	0	0	0	0	0

G. Average Monthly Forecast (Sum of months #1-6 (Part F above) divided by 6): 166.667

H. Months to Exhaust<sup>4</sup>  $\frac{\text{Numbers Available for Assignment to Customers (A)}}{\text{Average Monthly Forecast (G)}}$  = 5.970

I. Utilization<sup>5</sup>  $\frac{\text{Assigned Numbers (B) – Excluded Numbers (D)}}{\text{Total Numbering Resources (C) – Excluded Numbers (D)}}$  = 0.000 \* 100 =

Explanation: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

1. A copy of this worksheet is required to be submitted to the Pooling Administrator when requesting additional numbering resources in a rate center. For auditing purposes, the applicant must retain a copy of this document.  
 2. Net change in TNs no longer available for assignment in each previous month, starting with the most distant month as Month #1, and Month #6 as the current month.  
 3. Forecast of TNs needed in each following month, starting with the most recent month as Month #1.  
 4. To be assigned an additional thousands-block (NXX-X) for growth, "Months to Exhaust" must be less than or equal to 6 months. (FCC 00-104, § 52.15 (g) (3) (iii)).  
 5. Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g)(3)(ii))

**From:** john.auerbach@neustar.biz  
**Sent:** Tuesday, June 14, 2011 1:33 PM  
**To:** BERRIS, PATTY (ATTPB)  
**Cc:** PA\_Part3@neustar.biz  
**Subject:** PAS - Pooling Administrator's Response/Confirmation for Tracking Number: 803-MILL CREEK-SC-452090

## Pooling Administration System

Dated 14-June-2011

November 21, 2003  
ATIS-0300066.at3

Attachment 3

### Pooling Administrator's Response/Confirmation TBPAG Part 3

**Tracking Number :** 803-MILL CREEK-SC-452090

**Date of Application:** 06/14/2011 **Effective Date:** \_\_\_\_\_  
**Date of Receipt:** 06/14/2011 **Date of Response:** 06/14/2011

**Service Provider Name:** SBC INTERNET SERVICES, INC.  
(Telcordia™ LERG™  
Routing Guide ) OCN: 516C

**NPAC SOA SPID :** \_\_\_\_\_

**Pooling Administrator Contact Information:**  
**John Auerbach** \_\_\_\_\_ **Phone:** 925-363-8706  
**Signature of Pooling Administrator**  
**John Auerbach** \_\_\_\_\_ **Fax:** 925-363-7684  
**Name (print)**  
**Email:** john.auerbach@neustar.biz

**NPA-NXX or NPA-NXX-X :** \_\_\_\_\_ **Block Assigned:** \_\_\_\_\_  
**Block Reserved :** \_\_\_\_\_  
**Block Reservation Expiration Date :** \_\_\_\_\_  
**Block/Code Modified :** \_\_\_\_\_  
**Block/Code Disconnected :** \_\_\_\_\_

**Block Contaminated(Yes or No) :** \_\_\_\_\_  
**If Yes,enter the number of TNs contaminated :** \_\_\_\_\_

Switch Identification(Switch Entity/POI): <sup>1</sup>CHRLNCCA82Z

Rate Center:

MILL CREEK

Rate Center Sub Zone:

☒ **Form Complete, request denied.**

Explanation:

**DR-57: You do not meet the MTE and/or Utilization requirements, therefore this request for a new block is denied. You may proceed with requesting a State Waiver from the appropriate state commission using this Part 3 denial. If you are in disagreement with the disposition of this request, please refer to the Thousands-Block Number (NXX-X) Pooling Administration Guidelines for the appeals process.**

☐ **Request withdrawn.**

Explanation:

☐ **Assignment activity suspended by the administrator.**

Explanation:

**Remarks:**

<sup>1</sup> This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI <sup>TM</sup> Location Identification code of the switching entity/POI shown on the Part 1A form (Telcordia, LERG ROUTING Guide and CLLI are trademarks of Telcordia Technologies, Inc.)

**neustar**





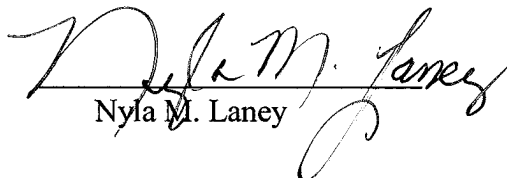
Ms. Amy Putnam  
Director-Neustar National Pooling Administrator  
1800 Sutter Street  
Suite 780  
Concord, CA 94520  
**(Electronic Mail)**

F. David Butler, Esquire  
General Counsel  
S. C. Public Service Commission  
Post Office Box 11649  
Columbia, South Carolina 29211  
(PSC Staff)  
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Jocelyn G. Boyd, Esquire  
Chief Clerk  
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Nyla M. Laney